

# **EXHIBIT 9**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In Re: AUTOMOTIVE PARTS	:	12-md-02311
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ANTITRUST LITIGATION	:	Honorable Marianne O. Battani
	:	
In Re: WIRE HARNESS CASES	:	
	:	
THIS RELATES TO:	:	
END PAYOR CASES	:	AV:12-cv-00101-MOB-MKM

END PAYOR PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS TO ALL DEFENDANTS

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, the Indirect Purchaser Plaintiffs serve this First Set of Requests for Production of Documents to All Defendants. Plaintiffs request that Defendants produce the documents described below for inspection and copying, within thirty (30) days after service hereof, at the offices of Cotchett, Pitre & McCarthy, LLP, 840 Malcolm Road, Burlingame, CA 94010 or at such other place, time or manner as mutually agreed by the parties.

DEFINITIONS

The following Definitions apply to these Requests:

1. "Agreement" means any oral or written contract, arrangement or understanding, whether formal or informal, between two or more persons, together with all modifications and amendments thereto.
2. "All" includes "each" and "any," and vice versa.
3. "And" and "or" are interchangeable. "And" is understood to include and encompass "or," and vice versa.

outing, or event of any trade association, trade show, or other industry group related to Wire Harness Products, as well as any committees or subcommittees thereof, including, but not limited to, the North American International Auto Show and the Automotive Aftermarket Products Expo.

RESPONSE:

REQUEST FOR PRODUCTION NO. 7:

All reports, statistical bulletins, or other documents that you have submitted to or received from any trade association, trade show, or other industry group, including market research firms, related to your Wire Harness Products business, including, but not limited to, documents submitted to or received from the North American International Auto Show and the Automotive Aftermarket Products Expo, as well as any committees or subcommittees thereof.

RESPONSE:

REQUEST FOR PRODUCTION NO. 8:

All documents relating to your attendance at or participation in any trade shows related to Wire Harness Products, including, without limitation, documents that relate to any discussions, meetings or communications with any other Defendant, manufacturer or seller of Wire Harness Products before, during, or after such trade shows.

RESPONSE:

REQUEST FOR PRODUCTION NO. 9:

All documents that you have provided or produced to the United States Department of Justice, the Canadian Competition Bureau, the Japan Fair Trade Commission, the European Commission or any other domestic or foreign governmental entity, related to any investigation, request for information, or proceeding involving Wire Harness Products, including, but not limited to, proffers, transcripts, testimony, witness statements, responses to requests for information, documents related to plea

bargain negotiations, documents related to any application for or grant of amnesty or leniency, and any documents related to any penalties or fines imposed on your company.

RESPONSE:

REQUEST FOR PRODUCTION NO. 10:

All documents relating to any meeting, discussion, communication, agreement or understanding, or joint defense strategy between or among any Defendants, manufacturers or sellers of Wire Harness Products, relating to any investigation, proceeding, or request for information involving Wire Harness Products by the United States Department of Justice, the Canadian Competition Bureau, the Japan Fair Trade Commission, the European Commission or any other domestic or foreign governmental entity.

RESPONSE:

REQUEST FOR PRODUCTION NO. 11:

All documents that relate to any lawsuit or other adversarial proceeding in which you were a party, at any time, and which concerned any alleged violation of any federal, state or foreign antitrust or other competition law relating to the production, pricing, marketing, distribution, or sale of Wire Harness Products.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12:

All documents relating to your policies or practices directed toward compliance with any antitrust or other competition law, including any statements signed by your employees with pricing, sales, or marketing responsibility for Wire Harness Products, acknowledging their receipt of and compliance with your antitrust or other competition law compliance policy or policies.

RESPONSE:

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